

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP., )  
Plaintiff, )  
v. ) Misc. No. 17-151-LPS  
BOLIVARIAN REPUBLIC OF )  
VENEZUELA, )  
Defendant. )

**AMBER ENERGY, INC. DISCLOSURE OF WITNESSES**

Pursuant to the scheduling order entered on August 22, 2025, D.I. 2110, Amber Energy, Inc. (“Amber”) hereby gives notice that it intends to call the following witness at the Sale Hearing:

| <b><u>Witness</u></b> | <b><u>Potential Testimony</u></b>                                                                                                                              | <b><u>Justification</u></b>                                                                                                                                                                                                                           |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Michael Turkel        | Amber’s August 22 bid—which the Special Master has recommended the Court adopt as the Updated Final Recommendation (D.I. 2123)—and related factual background. | Mr. Turkel’s testimony is warranted because Amber’s bid has been designated the Updated Final Recommendation, and the Sale Hearing will evaluate whether to approve Amber’s bid. Mr. Turkel will offer context to the bid in evaluating its approval. |

Amber reserves all rights, including the rights to call other parties’ witnesses and to call rebuttal witnesses.

Dated: August 31, 2025

Respectfully submitted,

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